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2 CHAPTER 13 TRUSTEE  
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**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

In re	)	Case No.: 18-10482 DM
EVETTE FRANCES and KEVIN CORTEZ	)	<b>TRUSTEE'S OBJECTION TO DEBTOR'S</b>
MINOR	)	<b>MOTION TO MODIFY CHAPTER 13</b>
Debtor.	)	<b>PLAN</b>

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**TO THE UNITED STATES BANKRUPTCY JUDGE, DEBTOR(S)' COUNSEL,**  
**DEBTOR(S), AND OTHER PARTIES IN INTEREST:**

David Burchard, Chapter 13 Trustee ("Trustee"), for the Santa Rosa and San Francisco Divisions of the United States Bankruptcy Court for the Northern District of California, hereby submits the following Objection to the Motion to Modify Chapter 13 Plan proposed by Debtor(s), filed on . This objection is based upon all pleadings, papers and documents filed herein, together with those matters of which judicial notice has been requested, and any oral argument, which may be presented.

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1 The Trustee is unable to verify the basis for the motion to modify and Debtor's  
2 substantial change in income and/or expenses without Debtor providing the following  
3 information:  
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5 X Updated Schedules I and J, utilizing the schedules effective December 2015.

6 X A signed copy of the debtor's filed 20\_\_ Federal Income Tax Return

7 X Verification of income to substantiate change in plan payments in the form of  
8 payment advices for the last 60 days. If the debtor does not receive payment  
9 advices, the Trustee requests copies of bank statements for the last 2 months  
10 from all bank accounts in which debtor is a signatory.

11 \_\_\_\_ Other:

12 (1) \_\_\_\_\_

13 (2) \_\_\_\_\_  
14

15 Therefore, the Trustee requests that this objection be sustained, Debtor's Application to  
16 Modify Chapter 13 Plan be denied, and other relief this Court deems proper.  
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18 Dated: April 15, 2020

/s/ David Burchard

DAVID BURCHARD

CHAPTER 13 TRUSTEE  
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The following recipients have been served via Court's Notice of Electronic Filing:

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CATHLEEN LEONARD

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